

# EXHIBIT 2

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

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APPLE INC., a California )  
corporation, )  
) )  
Plaintiff, )  
) )  
vs. ) No. 11-CV-01846-LHK  
) )  
SAMSUNG ELECTRONICS CO., LTD, )  
a Korean business entity; )  
SAMSUNG ELECTRONICS AMERICA, )  
INC., a New York corporation; )  
SAMSUNG TELECOMMUNICATIONS )  
AMERICA, LLC, a Delaware )  
limited liability company, )  
) )  
Defendants. )  
\_\_\_\_\_ )

VIDEOTAPED DEPOSITION OF MANI SRIVASTAVA

Los Angeles, California

Wednesday, April 25, 2012

HIGHLY CONFIDENTIAL

Reported By:  
SUSAN A. SULLIVAN, CSR #3522, RPR, CRR  
JOB NO. 48799

1 originally being anticipatory; is that correct?

2 A I analyzed them and found them to be  
3 anticipatory. I did have access to Apple's  
4 invalidity contentions.

5 Q But, in other words, you didn't come up  
6 with the Suso reference yourself, you were limited  
7 to what Apple had disclosed under the local rules;  
8 is that correct?

9 A Right. I was told that I was limited to  
10 it, yes.

11 THE VIDEOGRAPHER: We're getting pretty close to  
12 the end of the tape.

13 MR. STRETCH: Why don't we change the tape.

14 THE VIDEOGRAPHER: This marks the end of Disc  
15 No. 1 in the continuing deposition. The time is  
16 11:18 a.m. and we are now off the record.

17 (Recess)

18 THE VIDEOGRAPHER: This marks the beginning of  
19 Disc No. 2 in the continuing deposition. The time  
20 is 11:30 a.m. and we're back on the record.

21 BY MR. STRETCH:

22 Q Doctor, let me ask you to first before we  
23 look at the actual references, ask you to look at  
24 Exhibit, I think it is 2A. It is the claim of the  
25 '460 that's asserted.

1 A Uh-huh.

2 Q Do you have that in front of you?

3 A Yes.

4 Q Now I understand that you have various  
5 opinions and arguments about that it is not  
6 infringed, it is invalid, everything else.

7 Can we agree that at the very least this

8 claim requires the three core functions that Dr.

9 Yang opined on? And by that I mean two separate

10 E-mail transmission modes, one for text only, one --

11 a second one for sending E-mail that's entered

12 through a display sub-mode and the ability to

13 sequentially display other images stored in memory?

14 MS. WHELAN: Objection.

15 THE WITNESS: I do find the claim overall

16 confusing as to what method it is citing. Whether

17 there are two E-mail sub-modes or not, the claim

18 language does use the first E-mail sub-mode and the

19 second E-mail sub-mode. As I alluded to in my

20 report, the specification is at variance with that.

21 But in terms of does it talk about sending an E-mail

22 text alone, an E-mail with text and image and

23 sequentially scrolling through the images, yes, the

24 claim does talk about these three things.

25 Q BY MR. STRETCH: Okay.

